



June 22, 2021

SO ORDERED

**BY ECF**

The initial conference is adjourned from  
June 30, 2021 to September 8, 2021 at 9:30 a.m.

Hon. George B. Daniels, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

JUN 24 2021

*George B. Daniels*  
HON. GEORGE B. DANIELS

Re: Tremont Renaissance Housing Development Fund Co., Inc., et al. v.  
Lexington Ins. Co. and International Ins. Co. of Hannover SE  
(S.D.N.Y. No. 1:21-cv-02205-GBD)

Our File: 449363

Dear Judge Daniels:

This firm is counsel for plaintiffs Tremont Renaissance Housing Development Fund Company, Inc., Tremont Renaissance LLC, Tremont Renaissance Affordable LLC, Mastermind Development LLC, and Joy Construction Corp. (collectively, "Plaintiffs"). We have received the Court's March 15, 2021 Initial Pretrial Conference Order scheduling a pretrial conference (by telephone) on June 30, 2021 at 9:30 a.m. We write on behalf of Plaintiffs and defendant Lexington Insurance Company ("Lexington") to respectfully request an adjournment of the pretrial conference for approximately 45 days from the current scheduled date.

Plaintiffs and Lexington are ready and available to appear for the conference as scheduled, but we are requesting this adjournment as defendant International Ins. Co. of Hannover SE ("Hannover") has not yet filed its answer to the complaint. We are in communication with Hannover representatives, who have been provided with a copy of the Court's Initial Pretrial Conference Order, and we believe Hannover is still in the process of retaining counsel. We are also awaiting Hannover's confirmation that the company has accepted service after Plaintiffs' formally served copy of the complaint was returned as undeliverable to the address in Germany that Plaintiffs believed was Hannover's current corporate headquarters. We believe that these matters would be

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resolved by an adjourned date, and that it would be of benefit to all parties to have Hannover's participation in the initial conference.

In accordance with ¶ II.C. of Your Honor's Individual Rules And Practices, we note that there have been no previous requests for an adjournment of the original June 30, 2021 conference date, and as such, no previous requests have been granted or denied. Counsel for Lexington consent to this adjournment request and an adjournment would not affect any other scheduled dates.

We are available to provide any additional information the Court may require, and we thank the Court for considering this request.

Respectfully submitted,

DELAHUNT LAW PLLC

A handwritten signature in black ink, appearing to read 'Timothy E. Delahunt', is written over the printed name and email address.

Timothy E. Delahunt

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cc (by ECF):

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